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April 26, 2022

VIA ELECTRONIC FILING

Honorable Paul A. Crotty
Judge of the United States District Court for
The Southern District of New York
40 Foley Square
New York, NY 10007

Re: **United States v. Paul Fishbein**
21-CR-296

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J., Part I

Dated: *April 27, 2022*

Dear Judge Paul Crotty,

Counsel for Paul Fishbein respectfully submits this letter in reply to the Government's opposition letter, filed on April 25th, through AUSA Sarah Kushner, for Mr. Fishbein to travel to Atlantic City, New Jersey from April 27th until April 30th, 2022. Mr. Fishbein is requesting travel to celebrate with his family the fiftieth (50) birthday of his sister, Amy Khan.

The government's Opposition states that the reason for their objection is due it being difficult for pretrial to monitor Mr. Fishbein while in New Jersey. Mr. Fishbein is currently wearing a location monitor on his leg which would allow pretrial to locate Mr. Fishbein at all times. Mr. Fishbein has appeared at every single court appearance in front of this court and has been fully compliant of all pretrial conditions. Additionally, Mr. Fishbein will be traveling with the cosigners of his bond. The cosigners were approved by pretrial.

Counsel appreciates the Government's concession on a day visit; however, given the approximate two-hour drive each way, travel on the same day would greatly limit the amount of time for the visit, without either extending the curfew or allowing an overnight stay.

For the reasons set forth herein, Mr. Fishbein should be allowed to travel for this limited period over the objections raised.

Thank you for your time and attention in this matter.